Small Business Administration First Scorecard Plan for Fiscal Year 2008

Agency: U.S. Environmental Protection Agency

Office: Office of Small and Disadvantaged Business Utilization

Date: February 14, 2008

PLAN (RIGHT SIDE OF SCORECARD)

For the First Scorecard of the Fiscal Year, to be issued during the second quarter, responses to each of nine elements will be evaluated regarding the small business program *plan* for the fiscal year. For each of the three factors, the evaluator will score either a "1" for a positive response or a "0" as a negative or non-applicable response.

An overall evaluation will be characterized as follows: Scores ranging 0 to 7.2 will be deemed 'Red,' scores ranging from 7.3 to 8.9 will be deemed 'Yellow,' and Scores of 9.0 will be deemed 'Green.' Note that standard rounding conventions will be observed in calculating scores.

The left and middle portion of the January scorecard will not be evaluated as they represent the agency's FY 2007 accomplishments against goals, and FY2008 goals.

Evaluation Measure #1 (First Scorecard -Plan)

Implemented strategic plan to increase the number of *competitively* awarded contracts to small businesses during the period

How will SBA evaluate response?

The agency will need to clearly define and document a strategy to increase competitive opportunities under procurement preference programs.

Examples:

- Schedule showing an outreach calendar of events, such as vendor outreach session for specific preference groups (e.g. women-owned small business, service disabled veteran owned small business, HUBZone, etc.)
- An annual or multi-year plan to increase the number of competitively awarded contracts to small businesses during the period
- Yes or No? _____ Agency clearly defined and documented a strategy to increase competitive opportunities under procurement preference programs.

Brief Agency Comment for Scorecard:

EPA's Office of Small and Disadvantaged Business Utilization (OSDBU) will continue to work

collaboratively with the Office of Acquisition Management (OAM) to increase the number of competitively awarded contacts to small businesses. This includes providing input to OAM for the Agency's Acquisition Forecast Call Memo to program offices to provide a projection of its small business goals. This will entail that they identify specific contract opportunities for small businesses as well as set-asides. Additionally:

- 1) EPA's OSDBU publishes a calendar of events that is both internal and external to the Agency. Our office has a listing of our outreach sessions on our website:

 www.epa.gov/osdbu. Our vendor outreach sessions do specify specific preference groups to include the month of March for Woman-owned small businesses for Women's History Month and November for SDVOSBs in honor of Veteran's Day. Our office also sets aside vendor outreach for Hubzone and environmentally focused small businesses. Since our functional area has expanded, we recently added HBCUs/MAIs to our outreach session schedule.
- 2) OSDBU participates in the annual acquisition planning meetings with the Office of Acquisition Management (OAM) and program offices to discuss the upcoming requirements for the immediate fiscal year and the upcoming three (3) years and their appropriateness for small businesses. The FY 2008 Acquisition Call Letter is currently being drafted by OAM.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure # 2 (First Scorecard – Plan)

Demonstrated top-level Agency commitment to small business contracting during the period.

How will SBA evaluate response?

The agency will need to have a documented expression of commitment to small business contracting at the agency-head, or deputy agency-head, level within the previous twelve months.

- Affirmative public statements by senior level executives supporting award of contracts under socioeconomic procurement preference programs.
- Affirmative internal statements by senior level executives encouraging or mandating award of contracts under socioeconomic procurement preference programs.
- Inclusion of such commitment to award of contracts under socioeconomic procurement preference programs in strategic and/or operating plans, and/or annual individual performance work plans; etc.

•	Yes or No?	Agency provided a documented expression of top-level agency
	commitment.	

Brief Agency Comment for Scorecard:

EPA's small business programs have the commitment of the Administrator Stephen Johnson, Deputy Administrator Marcus Peacock and the Agency's senior leadership. EPA's top-level management has demonstrated a keen interest in the Agency's small business programs.

Examples include:

- 1) EPA's OSDBU Director reports directly to EPA's Deputy Administrator Marcus Peacock. They meet regularly to discuss strategies and issues regarding EPA's small business program. Their meetings include discussions of the effectiveness of EPA's small business performance measures on increasing the percentage of procurement dollars awarded to small businesses. This performance measure has had a positive impact on the percentage of awards made to all categories of small businesses, as the accomplishments under all socioeconomic categories have constantly improved since the inception of the performance measures.
- 2) The OSDBU Director is included in the Administrator's weekly senior staff meetings. Following the release of each quarterly Small Business Goal Accomplishment Report, the Deputy Administrator discusses the program with EPA's senior managers at the Administrator's senior staff meetings.
- 3) The Agency's small business goals are included in the "Quarterly Management Report" a short list of important Agency-wide programs and performance measures tracked by the Deputy Administrator.
- 4) The OSDBU Director meets with the Agency's Chief of Staff and Deputy Chief of Staff on an ongoing basis. OSDBU is actively involved in the Assistant Regional Administrators' (ARA) monthly conference calls, quarterly ARA meetings and other forums to further advance the program among the Agency's leadership. This includes attending regularly scheduled meetings and participating on conference calls with managers in the Superfund program.
- 5) The OSDBU Director meets with the principals of the program offices and the Regional Administrators to discuss the small business imitative highlighting their accomplishments and offering methods to improve their overall accomplishments. This has garnered their continued support for the program. The OAM Director also meets with the Senior Resource Officials (SROs) to discuss the program's acquisitions and the impact on the small business program.
- 6) On October 16, 2007, EPA celebrated the Administrator's 19th Annual Small and

Disadvantaged Business Awards Ceremony in recognition of small business achievements by small businesses, EPA program and regional offices and senior leadership's commitment to the Agency's small business program. OSDBU will be planning the 20th celebration this fiscal year to take place in the first quarter of FY 2009.

7) EPA's OSDBU has been collaborating with the Director of the Office of Human Resources to include acquisition language as applicable in the performance standards of appropriate personnel. Acquisition language regarding SDVOSBs is currently included in the performance standards of the Agency's senior leadership and small business language is included in the standards of the Agency's GS-1102 population.

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Brief SBA Comment for Scorecard:

Evaluation Measure # 3 (First Scorecard – Plan)

Planned significant events to increase small business participation in the procurement process during the period.

How will SBA evaluate response?

The agency will need to have enacted a comprehensive small business plan that includes written policies and procedures focused on improving the competitive environment and increasing small business participation in the procurement process.

Examples:

- Plans to sponsor relevant outreach events or educational activities.
- Plans to implement a relevant supplemental small business policy or procedure.
- Plans to work with SBA on small business matchmaking events for members of socioeconomic preference programs such as women-owned small businesses, servicedisabled veteran-owned small businesses, and HUBZone certified firms.

•	Yes or No?	Agency clearly enacted a comprehensive small	business	program
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Brief Agency Comment for Scorecard:

In FY 2008, EPA plans to sponsor conferences and expos to increase small participation in the Agency procurement process. These include:

1) OSDBU Counseling Sessions for FY 08 include: Woman-Owned Small Businesses (Mar 08), Hubzone Businesses (Jul 08), HBCU/MAIs (Sep 08), Small

- Environmental/Brownfield Businesses (Oct 08) and Serviced Disabled Veteran Owned Small Businesses (Nov 08);
- 2) This is only a partial list of the events EPA's OSDBU will be participating in during FY 2008: Reservation Economic Summit & American Indian Business Trade Fair (RES 2008) (Mar 08), US Hispanic Chamber of Commerce, US Women's Chamber of Commerce (Mar 08), US Pan Asian American Chamber of Commerce (May 08), National Veterans Small Business Conference and Expo sponsored by DOD (Jul 08), local DC area and nationally sponsored SBA Matchmaking events, Congressionally-sponsored events, Med Week sponsored by the Dept of Commerce (Sep 08), Veterans Business Journal East Coast Conference (Sep 08);
- 3) Round table discussions with Woman-Owned Small Businesses and SDVOSBs;
- 4) EPA's regionally-based Minority Business Enterprise/Woman Business Enterprise (MBE/WBE) Coordinators are asked to provide a list of small business activities and events that they have participated or attended on a quarterly basis to OSDBU;
- 5) OAM will conduct the two annual Contractor Forums to provide updates on contracting issues and to acquaint attendees, which includes industry small businesses on future contracting opportunities; and
- 6) OAM is presently revising the Agency's acquisition policy in the Agency's Contract Management Manual (CMM) to ensure maximum participation of small businesses in acquisitions.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 4 (First Scorecard – Plan)

Demonstrates that small business data is accurately reported in FPDS-NG during the period

How will SBA evaluate response?

The agency will need to have established and documented a plan to ensure that small business data is accurately reported in FPDS-NG.

- Plan to verify and validate FPDS-NG data, pursuant to Office of Federal Procurement Policy Memorandum of March 9, 2007, entitled <u>Federal Procurement Data Verification</u> and Validation.
- Plans to encourages businesses to update their CCR information to accurately reflect size and social-economic business status

Yes or No? small busine	Agency has established and documented a process to ensure that ess data is accurately reported in FPDS-NG.
Brief Agency C	omment for Scorecard:
	EPA's Office of Acquisition Management identifies incorrect or rejected data. When any incorrect or rejected data is identified, the Contracting Officer inputs a help desk ticket to get support to resolve the problem. OAM works to ensure all data is accepted. EPA has a process in our simplified acquisition system (SPEDI) to ensure that the correct data on all small business categories in the system is directly linked to the Central Contractor Registry (CCR) and the information of the firm in CCR is automatically populated in the FPDS-NG data to ensure accuracy of the data. Thirty days after the end of each quarter, OAM submits draft reports to the program offices for review, which has assisted in improving the reporting of the data.
	Annually, at the end of each fiscal year, OAM works with the procurement personnel to finalize actions in ICMS/FPDS-NG to enable all required data to be included in the end of the year summary reports.
	As a major customer of the Army Corps of Engineers, EPA has held meetings with OFPP and the Army Corps of Engineers to identify any irregularities that impacts our procurement baseline. Meetings and the review of the system are on-going. EPA and USACE are drafting an MOU to outline the roles and responsibilities each will have in the proper coding of projects performed under interagency agreements. OAM is working with the FPDS-NG Change Control Board to obtain detailed program office reporting capability to monitor and verify office achievements.
Evaluator Com	ments:

Evaluation Measure# 5 (First Scorecard – Plan)

Demonstrates that policies and procedures are in place to ensure compliance with subcontracting plans and attainment of subcontracting goals during the period

How will SBA evaluate response?

Brief SBA Comment for Scorecard:

The agency will need to have established, documented, and enacted a systematic plan to enforce small business subcontracting plans and to meet subcontracting goals.

Examples:

• Plans to use the Electronic Subcontracting Reporting System (eSRS) to manage

• Plans to	ance with subcontracting goals and to ensure attainment of subcontracting goals. It is provide assistance and support to prime contractors to ensure compliance with tracting plans.
•	orce small business subcontracting plans and to meet subcontracting goals
Brief Agency C	Comment for Scorecard:
EPA ac	tively uses the eSRS system to ensure the appropriate approval and/or rejection of
submitted data.	
1)	EPA's OSDBU will continue to actively enforce the proper review of prime contractor's subcontracting plans. This includes ensuring compliance with the Agency's stated subcontracting goals. Those plans that do not meet or adhere to the Agency's goals will be deemed unacceptable and returned to the Contracting Officer with a written analysis of the areas where the contractor fell short.
# 2)	Contracting Officers have been instructed to electronically submit to OSDBU a copy of each approved subcontracting plan. OSDBU established a database of the subcontracting plans that allows our office to cross-check the approved subcontracting plans with the eSRS summary information submitted.
	Each subcontracting plan reviewed by OSDBU includes a reminder to the Contracting Officer to have the contractor "submit verification from the actual subcontractors performing the tasks and to provide the amount of work they are proposing under the requirement." Contracting Officers are advised to "monitor the total dollars expected to be subcontracted" and to include "the liquidated damages clause in the forthcoming contract to cover periods where [the contractor] does not meet its goals."
	The summary reports submitted via eSRS are compared with the information submitted in the approved subcontracting plans. Firms that submit summary reports not meeting our subcontracting goals as approved in the subcontracting plans will be rejected and informed of those specific socioeconomic categories they fail to meet. They will be asked to address the deficiencies and provide a plan of action.
	OSDBU will be meeting quarterly with the Office of Acquisition Management's point of contact for the Agency eSRS program to discuss issues and strategy. These meetings will occasionally include the SBA CMR assigned to EPA.

Evaluator Comments:

Evaluation Measure # 6 (First Scorecard – Plan)
Demonstrated no unjustified bundling has taken place during the period
How will SBA evaluate response?
The agency will need to have established, documented, and enacted systematic action plans to be taken to ensure no unjustified bundling has taken place during the reporting period.
Examples:
Plan to improve bundling activities review process.
 Plan to review FPDS-NG for all agency bundlings coded.
Yes or No? The Agency has established, documented, and enacted systematic actions to be taken to ensure no unjustified bundling has taken place during the reporting period.
Brief Agency Comment for Scorecard:
EPA will work closely with OAM and the program offices to identify any bundling and/or ward off any potential bundling. These actions include:
1) Review FPDS-NG on a quarterly basis;
2) Meeting with the Agency's Competition Advocate on a semi-annual basis to discuss strategies;
3) Meeting with the junior resource officials (JROs), whose responsible for their respective program's acquisition; and
4) Partner and collaborate with the Office of Acquisition Management's Procurement Policy division to provide training to the contracting officer's of their respective role and responsibility regarding bundling.
Evaluator Comments:
Brief SBA Comment for Scorecard:

Evaluation Measure# 7 (First Scorecard - Plan)

Planned training to contracting staff/managers in executing small business/socioeconomic procurements during the period

How will SBA evaluate response?

The agency will need to have planned at least 1 training session for the reporting period.

Acceptable responses may include, but need not be limited to the following:

- Maintenance of educational Intranet sites on small business programs covering program direction, critical documents, links to laws, regulations, and external contracting tools and resources.
- Plans to implement small business program orientation and training especially focusing on socioeconomic procurement preference programs such as women-owned small business, service-disabled veteran-owned small business, and HUBZone certified firms.

Yes or No? _____ The Agency has planned training for contracting staff/managers in executing small business/socioeconomic procurements.

Brief Agency Comment for Scorecard:

In FY 2007, OSDBU published a Small Business Pocket Guide that is distributed to contracting officers and program and project officers. The office provided training to contracting personnel and to the project officers.

In FY 2008, OSDBU will:

- 1) Revise and update the FY 2007 version of the Small Business Pocket Guide;
- 2) Complete the on-line small business training module; and
- 3) Provide small business training to the Program Offices and to the 1102 community.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 8 (First Scorecard – Plan)

Planned to collaborate with SBA on formulation of small business procurement policy initiatives during the period

How will SBA evaluate response?

The agency will need to demonstrate its intent to collaborate with SBA on at least one small business procurement policy initiative during the reporting period.

Acceptable responses may include, but need not be limited to the following:

• Active participation in the Small Business Procurement Advisory Council in small business procurement policy discussions.

Yes or No? The Agency has planned to collaborate with SBA on formulation of small business procurement policy initiatives during the period .	
 Brief Agency Comment for Scorecard: EPA is committed to working collaboratively with SBA. This includes Agency representation from the Office of Small and Disadvantaged Business Utilization at the Small Business Procurement Advisory Council. 	
Evaluator Comments:	
Brief SBA Comment for Scorecard:	
Evaluation Measure# 9 (First Scorecard - Plan) Agency submits by attachment copies of all strategic plans that became due to SBA during the reporting period How will SBA evaluate response? In order to receive credit for this element, the agency will need to have met 100% of deadlines for all required strategic plans and annual reports that were due to SBA, within the reporting period. (That is, from October 1, 2007 through the date of submission of the First Scorecard Report to	r
SBA. See Attachment 6. • Yes or No? Agency has met 100% of deadlines for all required strategic plans and annual reports that were due to SBA	
Brief Agency Comment for Scorecard: EPA is timely in its submission of the appropriate reports and will continue to provide those reports as required by SBA.	
Evaluator Comments:	
Brief SBA Comment for Scorecard:	

U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF SMALL AND DISADVANTAGED BUSINESS UTLIZATION

SBA FIRST SCORECARD PLAN FOR FISCAL YEAR 2008

Supplemental Information and Attachments

Table of Contents

Tab	Attachment
A	First Scorecard Plan FY 2008 dated 2/14/08
В	EPA OSDBU Small Business Counseling Sessions Schedule 2008 (Sample agendas from past and upcoming outreach counseling sessions) Office of Acquisition Management Contractor Forum, dated 10/24/07
С	Acquisition Planning Call Memorandum, dated 5/10/07 by Directors of OAM and OSDBU
D ·	FY 2007 Small Business Accomplishment Report with Memorandum, dated 12/27/07 and FY 2008 First Quarter Small Business Accomplishment Report dated 12/31/07
E	Quarterly Management Report tracked by the EPA Deputy Administrator
F	Program from the Administrator's 19 th Annual Small and Disadvantaged Business Awards Ceremony, held 10/16/07
G	Participation by MBE/WBE coordinators and small business specialists of quarterly small business activities
Н	Subcontracting Plan Checklist Email regarding collaborating with OAM on eSRS issues
I	EPA OSDBU Small Business Pocket Guide (being revised)
J	Sample of Small business on-line training module (being constructed)
K	Contracting Officers and Project Officer training agenda, dated 4/11/07 PowerPoint presentation of small business training provided to the Office of International Affairs (OIA) dated 1/24/08 (complete training package) and the Office of Environmental Compliance and Assurance's Office of Environmental Justice (OECA/EJ), dated 1/15/08 (cover only)

- L Memorandum forwarding quarterly ribbons of small business accomplishments to program and regional offices that met or exceeded small business goals dated 1/31/08
- M EPA participation at other Agencies and Departments small business outreach events; (DOE, SBA, DOD, VA, etc.), recognition from CVE (Veterans Affairs for SDVOSB accomplishments

Small Business Administration First Scorecard Plan for Fiscal Year 2008

Agency: U.S. Environmental Protection Agency

Office: Office of Small and Disadvantaged Business Utilization

Date: February 14, 2008

PLAN (RIGHT SIDE OF SCORECARD)

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An overall evaluation will be characterized as follows: Scores ranging 0 to 7.2 will be deemed 'Red,' scores ranging from 7.3 to 8.9 will be deemed 'Yellow,' and Scores of 9.0 will be deemed 'Green.' Note that standard rounding conventions will be observed in calculating scores.

The left and middle portion of the January scorecard will not be evaluated as they represent the agency's FY 2007 accomplishments against goals, and FY2008 goals.

Evaluation Measure #1 (First Scorecard –Plan) Implemented strategic plan to increase the number of competitively awarded contracts to small businesses during the period How will SBA evaluate response? The agency will need to clearly define and document a strategy to increase competitive opportunities under procurement preference programs. Examples: Schedule showing an outreach calendar of events, such as vendor outreach session for specific preference groups (e.g. women-owned small business, service disabled veteran owned small business, HUBZone, etc.) An annual or multi-year plan to increase the number of competitively awarded contracts to small businesses during the period Agency clearly defined and documented a strategy to increase Yes or No? competitive opportunities under procurement preference programs. Brief Agency Comment for Scorecard: PA's Office of Small and Disadvantaged Business Utilization (OSDBU) will continue to work

collaboratively with the Office of Acquisition Management (OAM) to increase the number of competitively awarded contacts to small businesses. This includes providing input to OAM for the Agency's Acquisition Forecast Call Memo to program offices to provide a projection of its small business goals. This will entail that they identify specific contract opportunities for small businesses as well as set-asides. Additionally:

- 1) EPA's OSDBU publishes a calendar of events that is both internal and external to the Agency. Our office has a listing of our outreach sessions on our website!

 www.epa.gov/osdbu. Our vendor outreach sessions do specify specific preference groups to include the month of March for Woman-owned small businesses for Women's History Month and November for SDVOSBs in honor of Veteran's Day. Our office also sets aside vendor outreach for Hubzon's and environmentally focused small businesses. Since our functional area has expanded, we recently added HBCUs/MAIs to our outreach session schedule.
- 2) OSDBU participates in the annual acquisition planning meetings with the Office of Acquisition Management (OAM) and program offices to discuss the upcoming requirements for the immediate fiscal year and the upcoming three (3) years and their appropriateness for small businesses. The FY 2008 Acquisition Call Letter is currently being drafted by OAM.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure # 2 (First Scorecard - Plan)

Demonstrated top-level Agency commitment to small business contracting during the period.

How will SBA evaluate response?

The agency will need to have a documented expression of commitment to small business contracting at the agency-head, or deputy agency-head, level within the previous twelve months.

- Affirmative public statements by senior level executives supporting award of contracts under socioeconomic procurement preference programs.
- Affirmative internal statements by senior level executives encouraging or mandating award of contracts under socioeconomic procurement preference programs.
- Inclusion of such commitment to award of contracts under socioeconomic procurement preference programs in strategic and/or operating plans, and/or annual individual performance work plans; etc.

• Yes or No? _____ Agency provided a documented expression of top-level agency commitment.

Brief Agency Comment for Scorecard:

EPA's small business programs have the commitment of the Administrator Stephen Johnson, Deputy Administrator Marcus Peacock and the Agency's senior leadership. EPA's top-level management has demonstrated a keen interest in the Agency's small business programs.

Examples include:

- 1) EPA's OSDBU Director reports directly to EPA's Deputy Administrator Marcus Peacock. They meet regularly to discuss strategies and issues regarding EPA's small business program. Their meetings include discussions of the effectiveness of EPA's small business performance measures on increasing the percentage of procurement dollars awarded to small businesses. This performance measure has had a positive impact on the percentage of awards made to all categories of small businesses, as the accomplishments under all socioeconomic categories have constantly improved since the inception of the performance measures.
- 2) The OSDBU Director is included in the Administrator's weekly senior staff meetings. Following the release of each quarterly Small Business Goal Accomplishment Report, the Deputy Administrator discusses the program with EPA's senior managers at the Administrator's senior staff meetings.
- 3) The Agency's small business goals are included in the "Quarterly Management Report" a short list of important Agency-wide programs and performance measures tracked by the Deputy Administrator.
- 4) The OSDBU Director meets with the Agency's Chief of Staff and Deputy Chief of Staff on an ongoing basis. OSDBU is actively involved in the Assistant Regional Administrators' (ARA) monthly conference calls, quarterly ARA meetings and other forums to further advance the program among the Agency's leadership. This includes attending regularly scheduled meetings and participating on conference calls with managers in the Superfund program.
- 5) The OSDBU Director meets with the principals of the program offices and the Regional Administrators to discuss the small business imitative highlighting their accomplishments and offering methods to improve their overall accomplishments. This has garnered their continued support for the program. The OAM Director also meets with the Senior Resource Officials (SROs) to discuss the program's acquisitions and the impact on the small business program.
- 6) On October 16, 2007, EPA celebrated the Administrator's 19th Annual Small and

Disadvantaged Business Awards Ceremony in recognition of small business achievements by small businesses, EPA program and regional offices and senior leadership's commitment to the Agency's small business program. OSDBU will be planning the 20th celebration this fiscal year to take place in the first quarter of FY 2009.

7) EPA's OSDBU has been collaborating with the Director of the Office of Human Resources to include acquisition language as applicable in the performance standards of appropriate personnel. Acquisition language regarding SDVOSBs is currently included in the performance standards of the Agency's senior leadership and small business language is included in the standards of the Agency's GS-1102 population.

Evaluator Comme	

Brief SBA Comment for Scorecard:

Evaluation Measure # 3 (First Scorecard - Plan)

Planned significant events to increase small business participation in the procurement process during the period.

How will SBA evaluate response?

The agency will need to have enacted a comprehensive small business plan that includes written policies and procedures focused on improving the competitive environment and increasing small business participation in the procurement process.

Examples:

- Plans to sponsor relevant outreach events or educational activities.
- Plans to implement a relevant supplemental small business policy or procedure.
- Plans to work with SBA on small business matchmaking events for members of socioeconomic preference programs such as women-owned small businesses, servicedisabled veteran-owned small businesses, and HUBZone certified firms.

0	Yes or No?	Agency clearly enacted a comprehensive small business pro	gram

Brief Agency Comment for Scorecard:

In FY 2008, EPA plans to sponsor conferences and expos to increase small participation in the Agency procurement process. These include:

1) OSDBU Counseling Sessions for FY 08 include: Woman-Owned Small Businesses (Mar 08). Hubzone Businesses (Jul 08), HBCU/MAIs (Sep 08), Small

Environmental/Brownfield Businesses (Oct 08) and Serviced Disabled Veteran Owned Small Businesses (Nov 08);

- 2) This is only a partial list of the events EPA's OSDBU will be participating in during FY 2008. Reservation Economic Summit & American Indian Business Trade Fair (RES 2008) (Mar 08), US Hispanic Chamber of Commerce, US Women's Chamber of Commerce (Mar 08), US Pan Asian American Chamber of Commerce (May 08), National Veterans Small Business Conference and Expo sponsored by DOD (Jul 08), local DC area and nationally sponsored SBA Matchmaking events, Congressionally-sponsored events, Med Week sponsored by the Dept of Commerce (Sep 08), Veterans Business Journal East Coast Conference (Sep 08);
- 3) Round table discussions with Woman-Owned Small Businesses and SDVOSBs;
- 4) EPA's regionally-based Minority Business Enterprise/Woman Business Enterprise (MBE/WBE) Coordinators are asked to provide a list of small business activities and events that they have participated or attended on a quarterly basis to OSDBU;
- 5) OAM will conduct the two annual Contractor Forums to provide updates on contracting issues and to acquaint attendees, which includes industry small businesses on future contracting opportunities; and
- 6) OAM is presently revising the Agency's acquisition policy in the Agency's Contract Management Manual (CMM) to ensure maximum participation of small businesses in acquisitions.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 4 (First Scorecard – Plan)

Demonstrates that small business data is accurately reported in FPDS-NG during the period

How will SBA evaluate response?

The agency will need to have established and documented a plan to ensure that small business data is accurately reported in FPDS-NG.

- Plan to verify and validate FPDS-NG data, pursuant to Office of Federal Procurement Policy Memorandum of March 9, 2007, entitled <u>Federal Procurement Data Verification</u> and Validation.
- Plans to encourages businesses to update their CCR information to accurately reflect size and social-economic business status

0	Yes or No?		Agency has	established ar	nd documented		that
	small busine	ss data is a	ccurately rep	orted in FPDS	-NG.	•	

Brief Agency Comment for Scorecard:

- 1) EPA's Office of Acquisition Management identifies incorrect or rejected data. When any incorrect or rejected data is identified, the Contracting Officer inputs a help desk ticket to get support to resolve the problem. OAM works to ensure all data is accepted. EPA has a process in our simplified acquisition system (SPEDI) to ensure that the correct data on all small business categories in the system is directly linked to the Central Contractor Registry (CCR) and the information of the firm in CCR is automatically populated in the FPDS-NG data to ensure accuracy of the data. Thirty days after the end of each quarter, OAM submits draft reports to the program offices for review, which has assisted in improving the reporting of the data.
- 2) Annually, at the end of each fiscal year, OAM works with the procurement personnel to finalize actions in ICMS/FPDS-NG to enable all required data to be included in the end of the year summary reports.
- 3) As a major customer of the Army Corps of Engineers. EPA has held meetings with OFPP and the Army Corps of Engineers to identify any irregularities that impacts our procurement baseline. Meetings and the review of the system are on-going. EPA and USACE are drafting an MOU to outline the roles and responsibilities each will have in the proper coding of projects performed under interagency agreements. OAM is working with the FPDS-NG Change Control-Board to obtain detailed program office reporting capability to monitor and verify office achievements.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 5 (First Scorecard – Plan)

Demonstrates that policies and procedures are in place to ensure compliance with subcontracting plans and attainment of subcontracting goals during the period

How will SBA evaluate response?

The agency will need to have established, documented, and enacted a systematic plan to enforce small business subcontracting plans and to meet subcontracting goals.

Examples:

• Plans to use the Electronic Subcontracting Reporting System (eSRS) to manage

		h subcontracting goals and to ensure attainment of subcontracting goals e assistance and support to prime contractors to ensure compliance with plans.
•	Yes or No?plan to enforce sma	The Agency has established, documented, and enacted systematic II business subcontracting plans and to meet subcontracting goals

Brief Agency Comment for Scorecard:

EPA actively uses the eSRS system to ensure the appropriate approval and/or rejection of submitted data.

- 1) EPA's OSDBU will continue to actively enforce the proper review of prime contractor's subcontracting plans. This includes ensuring compliance with the Agency's stated subcontracting goals. Those plans that do not meet or adhere to the Agency's goals will be deemed unacceptable and returned to the Contracting Officer with a written analysis of the areas where the contractor fell short.
- 2) Contracting Officers have been instructed to electronically submit to OSDBU a copy of each approved subcontracting plan. OSDBU established a database of the subcontracting plans that allows our office to cross-check the approved subcontracting plans with the eSRS summary information submitted.
- 3) Each subcontracting plan reviewed by OSDBU includes a reminder to the Contracting Officer to have the contractor "submit verification from the actual, subcontractors performing the tasks and to provide the amount of work they are proposing under the requirement." Contracting Officers are advised to "monitor the total dollars expected to be subcontracted" and to include "the liquidated damages clause. ... in the forthcoming contract to cover periods where [the contractor] does not meet its goals."
- 4) The summary reports submitted via eSRS are compared with the information submitted in the approved subcontracting plans. Firms that submit summary reports not meeting our subcontracting goals as approved in the subcontracting plans will be rejected and informed of those specific socioeconomic categories they fail to meet. They will be asked to address the deficiencies and provide a plan of action.
- 5) OSDBU will be meeting quarterly with the Office of Acquisition Management's point of contact for the Agency eSRS program to discuss issues and strategy. These meetings will occasionally include the SBA CMR assigned to EPA.

Evaluator Comments:

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Evaluation Measure # 6 (First Scoreeard – Plan)

Demonstrated no unjustified bundling has taken place during the period

How will SBA evaluate response?

The agency will need to have established, documented, and enacted systematic action plans to be taken to ensure no unjustified bundling has taken place during the reporting period.

Examples:

- Plan to improve bundling activities review process.
- Plan to review FPDS-NG for all agency bundlings coded.
- Yes or No? _____ The Agency has established, documented, and enacted systematic actions to be taken to ensure no unjustified bundling has taken place during the reporting period.

Brief Agency Comment for Scorecard:

EPA will work closely with OAM and the program offices to identify any bundling and/or ward off any potential bundling. These actions include:

- 1) Review FPDS-NG on a quarterly basis:
- 2) Meeting with the Agency's Competition Advocate on a semi-annual basis to discuss strategies;
- 3) Meeting with the junior resource officials (JROs), whose responsible for their respective program's acquisition; and
- 4) Partner and collaborate with the Office of Acquisition Management's Procurement. Policy division to provide training to the contracting officer's of their respective role and responsibility regarding bundling.

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 7 (First Scorecard – Plan)

Planned training to contracting staff/managers in executing small business/socioeconomic procurements during the period

How will SBA evaluate response?

The agency will need to have planned at least 1 training session for the reporting period.

Acceptable responses may include, but need not be limited to the following:

- Maintenance of educational Intranet sites on small business programs covering program direction, critical documents, links to laws, regulations, and external contracting tools and resources.
- Plans to implement small business program orientation and training especially focusing on socioeconomic procurement preference programs such as women-owned small business, service-disabled veteran-owned small business, and HUBZone certified firms.

Yes or No? ____ The Agency has planned training for contracting staff/managers in executing small business/socioeconomic procurements.

Brief Agency Comment for Scorecard:

In FY 2007, OSDBU published a Small Business Pocket Guide that is distributed to contracting officers and program and project officers. The office provided training to contracting personnel and to the project officers.

In FY 2008, OSDBU will:

- 1) Revise and update the FY 2007 version of the Small Business Pocket Guide;
- 2) Complete the on-line small business training module; and
- 3) Provide small business training to the Program Offices and to the 1102 community

Evaluator Comments:

Brief SBA Comment for Scorecard:

Evaluation Measure# 8 (First Scorecard - Plan)

Planned to collaborate with SBA on formulation of small business procurement policy initiatives during the period

How will SBA evaluate response?

The agency will need to demonstrate its intent to collaborate with SBA on at least one small business procurement policy initiative during the reporting period.

Acceptable responses may include, but need not be limited to the following:

 Active participation in the Small Business Procurement Advisory Council in small business procurement policy discussions.

Yes or No?	The Agency has planned to collaborate with SBA on formulation of	
	rement policy initiatives during the period.	
Sinair dusiness procu	irement poncy initiatives during the period.	
Brief Agency Comn	nent for Scorecard:	
 EPA is comr 	mitted to working collaboratively with SBA. This includes Agency	
representatio	on from the Office of Small and Disadvantaged Business Utilization at the	
Small Busine	ess Proeurement Advisory Council.	Į.
Evaluator Commen	its:	
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Brief SBA Commen	nt for Scorecard:	
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Evaluation Measure	#9 (First Scorecard - Plan)	
Agency submits by	y attachment copies of all strategic plans that became due to SB.	A
during the reporti	na period	
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